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Clayton GROUP SERVICES

July 16, 2001

Mr. Stan Komperda
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Remedial Project Management Section
Bureau of Land
1021 North Grand Avenue
Springfield, IL 62794-9276

RE: Addendum #1 to the May 25, 2001 Comprehensive VOC Investigation Work Plan for The Lockformer Company, Lisle, Illinois.

Dear Mr. Komperda:

By way of this letter I am supplying you with Addendum #1 to the May 25, 2001 Comprehensive VOC Investigation Work Plan (Work Plan) for The Lockformer Company (Lockformer), Lisle, Illinois. What follows are responses to your General Comments and Specific Comments contained in your June 28, 2001 letter. I received your letter on July 2, 2001. The following are Lockformer's responses to your comments in the order in which they were received:

GENERAL COMMENTS

1. Section 3.7.1 of the Work Plan provides a discussion for the Lockformer production well pump test that was specifically requested in the Agreed Order. The discussion provided in Section 3.7.1 of the May 25, 2001 Work Plan is identical to the text contained in the February 2, 2001 and March 26, 2001 versions of the Work Plan. In addition, Lockformer voluntarily proposed a pump test of monitoring well MW-1102D to assess the Silurian Dolomite aquifer hydrogeologic characteristics in the May 25, 2001 Work Plan in Section 3.7.2.

   Considering the results of the most recent data from the groundwater investigations at the site, Lockformer would like to discuss the technical merits of performing the pump test on the site production well.

2. No comment necessary.

3. Yes, due to the lack of certainty involving the lithologies encountered during previous investigation efforts at the site, two additional stratigraphic control borings will be performed. These two borings will be adjacent to existing monitoring wells MW-521 and MW-126.

4. Clayton personnel volunteered during the May 23, 2001 meeting that we were making efforts to acquire data that would allow the interpretation of semi-regional groundwater flow in the Silurian Dolomite aquifer. Since the acquisition of this data is dependant on having access to public water supply wells in the area that are outside of Clayton's control, we do not believe that we made representations to IEPA or USEPA that we would present this data in the updated Work Plan. In fact, permission to acquire this data from the Village of Lisle public water supply wells is still not in hand.

   It has been Clayton's intention to present this data (when sufficiently acquired) in the VOC investigation report that is prepared at the conclusion of the efforts outlined in the Work Plan.

5. Clayton did commit to perform sampling of the sewer catch basins on the outside of the facility building. The lack of a discussion of this sampling in the Work Plan is an omission. However, the sampling of sediment from the storm and sanitary sewer catch basins at the facility has been performed under the IEPA contractor, Parsons Engineering Science, Inc. (Parsons), oversight. Parsons took sample splits during these investigation activities related to the storm and sanitary sewer system.

6. On the basis of stratigraphic determinations and chemical analyses that resulted from the further TCE tank source area investigation outlined in the Work Plan, Clayton advised Lockformer on the need for additional well installation in the source area. Lockformer voluntarily installed these wells to gain a better understanding of site conditions. These wells were installed under the supervision of Parsons, and Parsons had the opportunity to acquire soil and/or groundwater samples as they determined necessary.

SPECIFIC COMMENTS

1. Camera surveys were performed on all the coreholes to be tested with the double packer. The purpose of the camera survey was to identify the specific zones in the dolomite to set the packers. Camera survey videotape can be made available.

2. The adjacent coreholes to be monitored during each double packer test were chosen by Parsons.

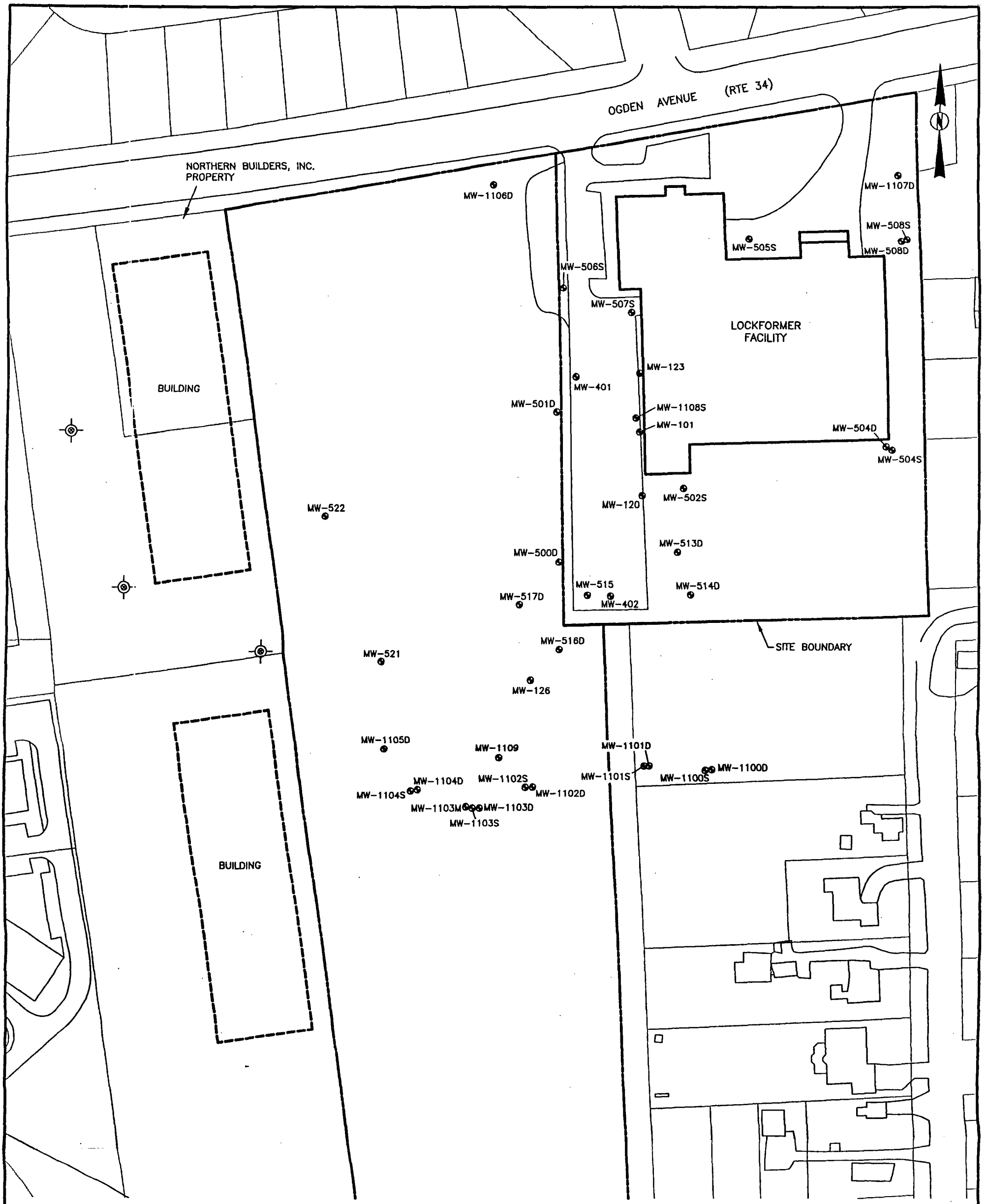
3. All monitoring wells that Lockformer has direct control over will have their static water levels acquired during the same day. Other wells (e.g., public water supply wells) that Lockformer does not have direct control over will have their static water levels determined in as close to a synoptic manner as possible.

4. The level at which the pump will be set during the pump test to take place on monitoring well MW-1102D will be determined during testing that will be performed prior to the pump test actually taking place. This pre-testing will be performed to determine the maximum sustainable yield of the formation for the pump test.

5. An updated Figure 4 is provided with this letter.

Sincerely,

Ronald B. St. John, PG
Vice President
Clayton Group Services, Inc.



LEGEND

- EXISTING MONITORING WELL
- PROPOSED WELL NEST LOCATIONS TO BE VERIFIED IN FIELD (BOTH GLACIOFLUVIAL AND BEDROCK WELL w/25-FOOT BEDROCK OPEN HOLE)

SCALE IN FEET

0 60 120 240

CHECK BY	
DRAWN BY	BCP
DATE	7-17-01
SCALE	AS SHOWN
CAD NO.	6526302DR
PRJ NO.	65263.01

MONITORING WELL LOCATION MAP

THE LOCKFORMER COMPANY
711 OGDEN AVENUE
LISLE, ILLINOIS

Clayton GROUP SERVICES
3140 FINLEY ROAD, DOWNERS GROVE, IL 60515

FIGURE 4